

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major, Construction/Operating Final Permit No. F-04-013 (Revision 1)

TRIM MASTERS INCORPORATED

1120 INDUSTRY ROAD, HARRODSBURG, KY

December 10, 2007

D. BRIAN BALLARD, P.E., REVIEWER

Plant I.D. # 021-167-00026

A.I. No. 6142

Activity ID: APE20070001

F-04-013 (REVISION 1):

The Division received an application for the addition of two new adhesive spray booths (EP05 and EP06) on November 20, 2007. Trim Masters Incorporated (TMI) is proposing to add the new spray booths in support of the upcoming 417 assembly line which will produce ornament sub-assemblies. TMI has indicated in the application that they are not seeking to revise the current source wide VOC and HAP emission limits in permit F-04-013. The application is being processed as a minor permit revision. Furthermore, the application indicates that TMI will be adding an additional touch-up spray booth to control touch-up painting in the plant.

SOURCE DESCRIPTION:

The Trim Masters, Inc. (TMI) manufacturing operation in Harrodsburg produces automobile interior parts for vehicles. The plant operations include adhesive spray booths for armrest assembly, ornament sub-assembly, Peterbilt and Kenworth Assembly lines. The source has applied for a construction and operation permit for these facilities.

COMMENTS:

Potential to emit (PTE) estimates for emission points #1 through #4 are based on throughput estimates considering rated capacity of each applicator with bottleneck. The source is potentially major for VOC and HAP emissions. The source has elected to accept limits for both VOC and HAP emissions.

Modeling of the toxic emissions from emission point #1 through #4 was conducted using SCREEN3. Toxic emission rates were found to be within emission limits set in the permit.

APPLICABLE REGULATIONS:

401 KAR 63:060 - List of hazardous air pollutants, petition process, lesser quantity designations, and source category list.

401 KAR 63:020 - Potentially Hazardous Matter or Toxic Substances, applies to the potentially hazardous matter and toxic substance emissions from affected facilities.

EMISSION AND OPERATING CAPS DESCRIPTION:

Trim Masters, Inc. has requested voluntary permit limits of less than:

1. 90.0 tons per year of volatile organic compounds (VOC)
2. 9.0 tons per year of individual hazardous air pollutants (HAP)
3. 22.5 tons per year of combined HAPs.

PERIODIC RECORDKEEPING:

The permittee shall maintain monthly records of the purchase and usage of the adhesives, hardeners, and cleaning solvents or any other HAP/VOC containing material. HAP/VOC emissions shall be calculated and recorded on a *monthly* basis. These records shall be summarized in tons per month HAP/VOC emissions; subsequently, tons of HAP/VOC emissions per 12-month period shall be recorded. This 12-month period shall be based on a 12-month rolling total representing the most recent year. In addition, these records shall comply with HAP/VOC emission limitations listed herein for the conditional major limitations. These records, as well as purchase orders and invoices for all HAP/VOC containing materials, shall be maintained on site for a period of five years from the date the data was collected and shall be provided to the Division upon request.

OPERATIONAL FLEXIBILITY: NA**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.